

20Guy W. Rogers  
Jon A. Wilson  
BROWN LAW FIRM, P.C.  
315 North 24<sup>th</sup> Street  
P.O. Drawer 849  
Billings, MT 59103-0849  
Tel. (406) 248-2611  
Fax (406) 248-3128

*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,  
and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA )  
MAPLEY, )

Plaintiffs, )

vs. )

WATCHTOWER BIBLE AND )  
TRACT SOCIETY OF NEW YORK, )  
INC., WATCH TOWER BIBLE AND )  
TRACT SOCIETY OF )  
PENNSYLVANIA, and BRUCE )  
MAPLEY SR., )

Defendants. )

Cause No. 1:20-cv-00052-SPW-TJC

**NOTICE OF APPEARANCE FOR  
DEFENDANTS WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC., AND WATCH  
TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA,  
AND UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

---

NOTICE IS HEREBY GIVEN that attorneys Guy W. Rogers and Jon A. Wilson of the Brown Law Firm, P.C., 315 North 24<sup>th</sup> Street, P.O. Drawer 849, Billings, MT 59103-0849, Telephone: 406-248-2611 / Fax: 406-248-3128, will be acting as counsel of record for Defendants Watchtower Bible and Tract Society of New York, Inc. (hereinafter "Watchtower"), and Watch Tower Bible and Tract

Society of Pennsylvania (hereinafter “Watch Tower”). The undersigned has basically no information regarding the allegations asserted in Plaintiffs’ Complaint and Jury Demand (hereinafter “Complaint”) and needs additional time to consult with Watchtower and Watch Tower to formulate responses to the allegations in the Complaint. The undersigned recently contacted Plaintiffs’ counsel about the possibility of an extension until June 22, 2020, for Watchtower and Watch Tower to Answer or otherwise respond to the Complaint, and Plaintiffs’ counsel indicated no objection to such an extension. Watchtower and Watch Tower therefore respectfully requests an extension until June 22, 2020, to file an Answer or otherwise respond to the Complaint. By seeking this extension, Watchtower and Watch Tower do not waive any of the defenses under Rule 12(b), Fed.R.Civ.P., or any of the affirmative defenses under Rule 8(c), Fed.R.Civ.P., all of which are reserved. A proposed Order is submitted herewith for the Court’s consideration and convenience.

DATED this 20th day of May, 2020.

By: /s/ Guy W. Rogers  
Guy W. Rogers  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendants Watchtower  
Bible and Tract Society of New York,  
Inc., and Watch Tower Bible and  
Tract Society of Pennsylvania*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 20, 2020, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802

by the following means:

<u>1, 2</u> CM/ECF	<u>        </u> Fax
<u>        </u> Hand Delivery	<u>        </u> E-Mail
<u>        </u> U.S. Mail	<u>        </u> Overnight Delivery Services

By: /s/ Guy W. Rogers  
Guy W. Rogers  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendants Watchtower  
Bible and Tract Society of New York,  
Inc., and Watch Tower Bible and  
Tract Society of Pennsylvania*